

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES)
UNION OF MASSACHUSETTS, INC.,)

Plaintiff,)

vs.)

THE CENTRAL INTELLIGENCE)
AGENCY, *et al.*,)

Defendants.)
_____)

Civil Action No. 1:22-cv-11532

CONSENT MOTION FOR EXTENSION OF TIME
TO SUBMIT DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants the Central Intelligence Agency (“CIA”), the Office of the Director of National Intelligence (“ODNI”), the United States Department of Defense (“DoD”), and the National Security Agency (“NSA”) (collectively, “Defendants”) respectfully seek an extension of one week, until February 6, 2023, to submit their summary judgment motion in this matter.

Defendants’ summary judgment motion is currently due on January 30, 2023. *See* ECF No. 21. Defendants have now provided Plaintiff with final responses to Plaintiff’s FOIA requests,¹ and they have continued to work to prepare their forthcoming motion and the accompanying declaration from the Federal Bureau of Investigation on which they intend to rely. Unfortunately, additional time will be needed for Defendants to complete the coordination necessary to prepare and finalize those submissions. Additionally, unforeseen child-care issues

¹ NSA and ODNI provided their responses on January 17, 2023; DoD provided its response on January 19, 2023; and CIA provided its response on January 25, 2023.

have unexpectedly rendered undersigned counsel unavailable on January 30, 2023, and possibly January 31, 2023.

Defendants therefore seek to extend the January 30, 2023, deadline to February 6, 2023, and also seek commensurate one-week extensions for the remaining briefing schedule in this matter as follows:

Plaintiff's opposition and any cross-motion – February 27, 2023

Government's reply and any cross-opposition – March 16, 2023

Plaintiff's cross-reply – March 20, 2023

As the hearing on these submissions is currently set for March 28, 2023, Defendants do not herein seek a continuance of the hearing date.

Defendants conferred with Plaintiff's counsel regarding the instant motion, and counsel indicated that Plaintiff consents to the relief requested herein.

Dated: January 27, 2023

Respectfully submitted,

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Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director
Federal Programs Branch

/s/ Julia A. Heiman
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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to Plaintiff's counsel identified on the Notice of Electric Filing (NEF).

/s/ Julia A. Heiman

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